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January 4, 1990

TO: Stephen F. Schuesler and Kathleen Cavanaugh
Assistant Attorneys General
Environmental Protection Division
Department of Attorney General

FROM: William Creal and Chris Waggoner
Great Lakes and Environmental Assessment Section
Surface Water Quality Division

SUBJECT: HM Holdings Co./Allied Paper, Inc. - Interim Remedial Action
Involving Diversion of Portage Creek

This memorandum addresses the issues raised in Mr. DeWitt's December 5, 1989 letter to you and during our December 6, 1989 meeting with Allied Paper.

1. We would like to clarify an apparent misunderstanding of our November 21, 1989 memorandum to you which was forwarded to Mr. DeWitt. We recognize that some type of diversion will likely be necessary as part of total remediation of the site. In the memorandum, we recommended that Allied abandon the current approach being taken for diversion, specifically that of a more permanent diversion through the mill pond sludges or the bank. We continue to recommend that, in light of problems encountered during field studies, Allied evaluate other options for diversion, such as the temporary cofferdam/pump system described in Allied's September, 1988 report entitled Description of Removal Work Details Assumed for Purposes of Preparing Preliminary Cost Estimates.

2. Task 1 - Phase I Hydrogeologic Investigations

Phase I Hydrogeo results were to be submitted by November 15, 1989 pursuant to Allied's Addendum to the Work Plan for Stream Diversion Design Studies. During a November 15, 1989 telephone conversation, Greg Peterson indicated that only part of the Phase I Hydrogeo results were available. We indicated that it would be acceptable if Greg waited and sent a complete data package on November 17, pursuant to his request. Incomplete Phase I results were not received until December 1. When the remaining results are submitted, including a potentiometric surface map, static water level for monitoring well 110, and pump test results, Department staff will review and recommend Phase II activities.

3. Task 2 - Construction Feasibility Field Studies

Because of the lack of review time we have experienced in the past, we would appreciate the submittal of preliminary results whenever

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possible to allow us more review time. Specifically, Allied should submit the logs for soil borings taken along the west bank and upstream of monitoring well 112 as soon as possible.

In our November 21, 1989 comments on Allied's Addendum to the Work Plan for Stream Diversion Design Studies, we requested that Allied submit a plan indicating what steps will be taken to determine the sources and extent of contamination in relation to the seep encountered during the test pit field studies. Allied has indicated that they doubt that these findings will restrict diversion. We expect the conceptual plan to indicate how this, as well as the other groundwater contamination problems, will be addressed as far as construction issues and long-term effect on the new channel. In addition, the need for long-term remediation of these groundwater contamination problems will eventually have to be addressed.

9. Follow-Up to December 6, 1989 Meeting

During our meeting, Mr. DeWitt requested that we clarify our flow requirements for channel design and dam design/modification and that we provide information on the status of Department activities on the Kalamazoo River. The latter was provided to Mr. DeWitt during the meeting in the form of a March, 1989 Kalamazoo River Area of Concern Status Report and an October 26, 1989 Kalamazoo River PCB update memorandum from Bill Creal to Deputy Director Del Rector.

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Pursuant to Mr. DeWitt's request, we have discussed flow requirements with Bruce Menerey and Jim Hayes of Land and Water Management Division (LWMD). The flow requirement for channel design remains unchanged and is the 100 year flood flow with five feet of freeboard. This criterion is based on the 1978 PA 641, Solid Waste Management Act, as amended. The 100 year flood flow which should be used is 480 cfs based on the November, 1984 Flood Insurance Study, City of Kalamazoo, Kalamazoo County published by the Federal Emergency Management Agency.

Changing Nos.
At the meeting, it was indicated that the dam would be required to pass the 500 year flood event. Based on the followup discussions, it has been determined that the appropriate flow requirement for the dam is the 200 year flood flow plus 1.5 feet of freeboard. This is based on the current Dam Safety Act and the fact that the Alcott Street Dam is classified as a high hazard potential dam. Since the 1984 Flood Insurance Study did not report the 200 year flood flow, it was calculated by LWMD (Hydrologic Studies Unit) to be 640 cfs.

Attached is a copy of the attendance list from our December 6, meeting.

cc: F. M. SWQD
V. E. SWQD
S. F. ERD
T. J. ERD
J. B. Menerey, LWMD
R. J. Donohue
L. J. Hayes, LWMD